

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

Chapter 11

WELLPATH HOLDINGS, INC. et al.,<sup>1</sup>

Case No. 24-90533 (ARP)

Debtor.

**WITNESS AND EXHIBIT LIST**

Main Case No: 24-90533 (ARP)	Name of Debtor: Wellpath Holdings, Inc.
Adversary No.: N/A	Style of Adversary: N/A
Witnesses:	Judge: Alfredo R. Perez
Julia Sherwin	Courtroom Deputy: Akeita House
Michael Haddad	Hearing Date: January 14, 2025
	Hearing Time: 9:30 a.m. (central time)
Parties' Name: Jordan Deppe, Deceased, by and through his Successor in Interest, Michael Deppe; and Michael Deppe, Individually; and John Adena, Deceased, by and through his Co-Successors in Interest, Circe Adena and Richard Adena; Circe Adena, Individually, and Richard Adena, Individually	
Attorney's Name: Catherine A. Curtis	Attorney's Phone: 214-420-4049
	Nature of Proceeding: Motion to Enforce Stay

**EXHIBITS**

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1.	Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Honor and Incur Obligations to Professional Corporations and (B) Obtain New Professional Corporation Contracts (II) Extending Statutory Protections to Professional Corporations and (III) Granting Related Relief [ECF No. 15]				
2.	Debtors' Emergency Motion for Entry of Interim and Final Orders to Enforce the Automatic Stay or in the Alternative Extend				

<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/Wellpath>.

	the Automatic Stay to Non-Debtor Defendants [ECF No. 17]				
3.	Amended Interim Order Enforcing the Automatic Stay [ECF No. 69]				
4.	Amended Order (I) Authorizing the Debtors to (A) Honor and Incur Obligations to Professional Corporation and (B) Obtain New Professional Corporation Contracts (II) Extending Statutory Protections to Professional Corporations and (III) Granting Related Relief [ECF No. 91]				
5.	Response in Opposition to Debtors' Emergency Motion for Entry of Interim and Final Orders to Enforce the Automatic Stay or in the Alternative Extend the Automatic Stay to Non-Debtor Defendants [ECF No. 314]				
6.	Declaration of Julia Sherwin in Support of Response in Opposition to Debtors' Emergency Motion for Entry of Interim and Final Orders to Enforce the Automatic Stay or in the Alternative Extend the Automatic Stay to Non-Debtor Defendants [Exhibit 1 to ECF No. 314]				
7.	Declaration of Michael J. Haddad in Support of Response in Opposition to Debtors' Emergency Motion for Entry of Interim and Final Orders to Enforce the Automatic Stay or in the Alternative Extend the Automatic Stay to Non-Debtor Defendants [Exhibit 2 to ECF No. 314]				
8.	Proposed Order Denying Debtors' Emergency Motion for Entry of Interim and Final Orders to Enforce the Automatic Stay or in the Alternative Extend the Automatic Stay to Non-Debtor Defendants [ECF No. 315]				
9.	Objection to Debtors' Emergency Motion for Entry of an Order (1) Authorizing the Debtors to (A) Honor and Incur Obligations to Professional Corporations and (B) Obtain New Professional Corporation Contracts (II) Extending the Statutory Protections to Professional Corporations and (III) Granting Related Relief and Order Granting Same [ECF No. 606]				

10.	Proposed Order Partially Denying Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Honor and Incur Obligations to Professional Corporations and (B) Obtain New Professional Corporation Contracts, (II) Extending Statutory Protections to Professional Corporations and (III) Granting Related Relief [ECF No. 621]				
11.	Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology – Michael Haddad [ECF No. 803]				
12.	Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology – Julia Sherwin [ECF No. 804]				
13.	Debtors' Omnibus Objection to Motions for Relief from the Automatic Stay [ECF No. 827]				
14.	Management Services Agreement [Exhibit A to ECF No. 827]				
15.	Assignment of Management Services Agreement				
16.	Personal Services Agreement between the County of Shasta and California Forensic Medical Group, Inc.				
17.	First Amended Complaint for Damages, Declaratory and Injunctive Relief and Demand for Jury Trial [Deppe v Shasta County/Case No. 2:22-CV-00187]				
18.	Suggestion of Bankruptcy and Notice of Stay [ECF No. 89; Deppe v Shasta County/Case No. 2:22-CV-00187]				
19.	Amended Suggestion of Bankruptcy and Notice of Stay [ECF No. 92; Deppe v Shasta County/Case No. 2:22-CV-00187]				
20.	Second Amended Notice of Stay [ECF No. 98; Deppe v Shasta County/Case No. 2:22-CV-00187]				
21.	Stipulation and (Proposed) Order for Temporary Stay and Extension of Certain Expert Disclosure Deadlines [ECF No. 99; Deppe v Shasta County/Case No. 2:22-CV-00187]				

22.	Defendant Sanaz Parsa, M.D.'s Initial FRCP Rule 26(a)(1) Disclosure [Deppe v Shasta County/Case No. 2:22-CV-00187]				
23.	Allied Healthcare Professional and Supplemental Liability Insurance Policy Declarations				
24.	Coverys Parsa Insurance Policy 165812				
25.	Second Amended Complaint for Damages, Declaratory and Injunctive Relief and Demand for Jury Trial [ECF No. 81; Adena v Shasta County/Case No. 2:21-CV-00770]				
26.	Suggestion of Bankruptcy and Notice of Stay [ECF No. 103; Adena v Shasta County/Case No. 2:21-CV-00770]				
27.	Defendant Amanda Ream, RN's Notice of Stay [ECF No. 106; Adena v Shasta County/Case No. 2:21-CV-00770]				
28.	Amended Suggestion of Bankruptcy and Notice of Stay [ECF No. 108; Adena v Shasta County/Case No. 2:21-CV-00770]				

Dated: January 10, 2025

Respectfully submitted,

/s/ Catherine A. Curtis

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**CERTIFICATE OF SERVICE**

I hereby certify, that on January 10, 2025, a true and correct copy of the foregoing document was served at the time of filing by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on all parties registered to receive such service in the above captioned case.

/s/ Catherine A. Curtis

Catherine A. Curtis